

1 WATERS KRAUS & PAUL
2 INGRID M. EVANS (179094)
3 ievans@waterskraus.com
4 SUNDEEP PATEL (242284)
5 spatel@waterskraus.com
6 711 Van Ness Avenue, Suite 220
7 San Francisco, CA 94102
8 Telephone: (415)296-6060 or
9 800/226-9880
10 214/777-0470 (fax)

11 BONNETT, FAIRBOURN, FRIEDMAN & BALINT P.C.
12 ANDREW S. FRIEDMAN (*Pro Hac Vice admission*)
13 afriedman@bffb.com
14 KIMBERLY C. PAGE (*Pro Hac Vice admission*)
15 kpage@bffb.com
16 2901 N. Central Avenue, Suite 1000
17 Phoenix, AZ 85012
18 Telephone: 602/274-1100
19 602/274-1199 (fax)

20 Attorneys for Plaintiff and the Putative Class

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DAPHNE P. RAND, by and through DEBRA J. DOLCH, as Conservator of the Person and Estate of DAPHNE P. RAND, Conservatee, on Behalf of Themselves and All Others Similarly Situated.

Case No. CV 09 0639 SI

CLASS ACTION

STIPULATION AND [PROPOSED] ORDER MODIFYING THE COURT'S SCHEDULING ORDER

Plaintiff,
vs.
AMERICAN NATIONAL INSURANCE COMPANY, a Texas corporation.

Judge Susan Illston

Defendant.

Action Filed: 02/12/09

This stipulation is made between Plaintiff DAPHNE P. RAND, by and through DEBRA J. DOLCH, as Conservator of the Person and Estate of DAPHNE P. RAND, Conservatee, ("Plaintiff") and Defendant American National Insurance Company ("ANICO" or "Defendant"),

1 by and through their respective counsel of records, with respect to the following facts:
2

3 WHEREAS, the Court's Civil Pretrial Minute Order dated November 13, 2009 (Docket
4 No. 78) sets forth the current scheduling order.

5 WHEREAS, the parties stipulated to a one week extension of time for ANICO to respond
6 to the Court's February 9, 2010 Discovery Order concerning contact information for absent class
7 members.

8 WHEREAS, the parties are still conducting discovery and believe that the current
9 scheduling order should be modified to allow for completion of discovery, resolution of any
10 discovery disputes and any other matters;

11 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the
12 parties, through their undersigned counsel, that the parties request a revised schedule as follows:

	Current Date	Proposed Date
Hearing on Motion for Class Certification	June 9, 2010	September 1, 2010
Motion due	May 5, 2010	June 24, 2010
Opposition due	May 19, 2010	August 9, 2010
Reply due	May 26, 2010	August 23, 2010

13 The parties agree to vacate the expert designation and rebuttal expert designation deadlines as well
14 as the expert discovery cut-off. Instead, Plaintiff will designate experts concurrently with the
15 filing of her motion for class certification and Defendant will designate its rebuttal experts
16 concurrently with the filing of its opposition.

17 DATED: February 19, 2010

18 BONNETT, FAIRBOURN, FRIEDMAN & BALINT P.C.

19 By: /s/Andrew S. Friedman

20 ANDREW S. FRIEDMAN

21 Attorneys for Plaintiff DAPHNE P. RAND, by and
22 through DEBRA J. DOLCH, as Conservator of the
23 Person and Estate of DAPHNE P. RAND, Conservatee

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DATED: February 19, 2010

WATERS KRAUS & PAUL

By: /s/Ingrid M. Evans

INGRID M. EVANS

Attorneys for Plaintiff DAPHNE P. RAND, by and
through DEBRA J. DOLCH, as Conservator of the
Person and Estate of DAPHNE P. RAND, Conservatee

DATED: February 19, 2010

WILSON ELSER MOSKOWITZ EDELMAN & DICKER

By: /s/Thomas M. Herilhy with permission

THOMAS M. HERILHY

Attorneys for Defendant AMERICAN NATIONAL
INSURANCE COMPANY

IT IS SO ORDERED.

DATED: _____

By 
The Honorable Susan Illston
District Court Judge